

## REMARKS/ARGUMENTS

Claims 1 and 4-10 are pending in the present application. Claims 1 and 4 have been amended, and Claims 2 and 3 have been cancelled, herewith. Reconsideration of the claims is respectfully requested.

### **I. 35 U.S.C. § 102, Anticipation**

Claims 1-10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Hitz et al (Merging NT and UNIX Filesystem Permissions), hereinafter “Hitz”. This rejection is respectfully traversed.

Applicants have amended Claim 1 to include the features previously recited in Claims 2 and 3 (which are thus being cancelled herewith, without prejudice or disclaimer. In addition, Claim 1 has been amended to emphasize that there are a plurality of access mechanisms which each perform access control for a given filesystem type, and to better define the plurality of ‘access control lists’. It is urged that amended Claim 1 is not anticipated by the cited reference, as will now be described in detail.

The cited reference does not teach “associating two or more access control lists with a given filesystem object in a heterogeneous filesystem, wherein the heterogeneous filesystem comprises a native filesystem and one or more additional differing filesystems”. As can be seen, per the features of Claim 1 there are two or more access control lists associated with a given filesystem object in a heterogeneous filesystem, where such heterogeneous filesystem includes both a native filesystem and at least one additional differing filesystems. The cited reference does not teach a heterogeneous file system that includes multiple individual filesystems. For example, the cited reference explicitly states in the Abstract:

“This paper describes an integrated security model in which a **single filesystem** can contain both files with NT-style ACLs and files with UNIX-style permissions”.

As can be seen, this reference describes a single filesystem, not a heterogeneous filesystem, as claimed. The cited Hitz passage that is alleged to teach this claimed heterogeneous filesystem states that every ‘file’ having an NT access control list also has a set of UNIX permissions stored in it. Having permissions stored in an access control list does not teach a heterogeneous file system, as claimed. Instead, Hitz describes a single filesystem that can contain data files having different filesystem types.

Nor does the cited reference teach a *plurality* of access mechanisms which *each* facilitate access control for a given filesystem type by retrieving the appropriate access control list, as is now provided by the features of amended Claim 1. Instead, Hitz uses traditional processing of NT requests for NT-style files (since this is a native request), and traditional NFS requests for UNIX-style files (since this is also a native request), as described at Hitz page 3, col. 1, lines 6-11. As to handling non-native requests by the

Hitz unitary filesystem, an NT user is mapped to an equivalent UNIX user and then validated against standard user permissions (Hitz page 2, col. 1, lines 12-23). Similarly, a non-native NFS request is validated using special UNIX permissions (Hitz, Page 2, col. 1, lines 24-36). Because of this native/non-native distinction and associated processing by Hitz - where a single unitary filesystem either processes a request normally if the request is a type of request that is native to such filesystem, or processes the request using a user-mapping (NT to UNIX)/alternate validation (NFS to NT) if the request is a type of request that is non-native to such single unitary filesystem – there would be no reason to have a plurality of access mechanisms for different types of filesystems that are usable for accessing a given access control list for a particular filesystem type, as is provided by the features of amended Claim 1.

In effect, Hitz describes a system that is biased to perform native operations normally for filesystem requests that match the native filesystem, and to perform non-native operations in a specialized fashion. In contrast, per the features of Claim 1, because there are multiple filesystem types provided by the heterogeneous filesystem, such biasing or native/non-native distinction is not made or desired, as all file system requests are treated equally by accessing special access control mechanisms for a given filesystem type – because there is not a biased or dominate filesystem as is provided by Hitz (since Hitz teaches a system whereby the single filesystem is the biased/dominate system that accordingly processes native requests normally). In order to provide such equal treatment by the present invention, the combination of multiple access control lists and associated access mechanisms for accessing such access control lists provide for supporting multiple requests in a heterogeneous file system comprising a plurality of underlying filesystem types in an unbiased fashion without native/non-native concerns or distinctions.

For at least the above reasons, it is urged that the amendment to the claims has overcome the present rejection of such claims under 35 U.S.C. § 102.

Therefore, the rejection of Claims 1-10 under 35 U.S.C. § 102(b) has been overcome.

## II. Conclusion

It is respectfully urged that the subject application is patentable over the cited reference and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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